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Attorney for Defendant
Daekun Cho

United States District Court
Central District of California

United States of America,

Plaintiff,

v.

Daekun Cho,

Defendant.

Case No.: 23-cr-149-FMO

Ex Parte Application for
Status Conference re Application for
Review of Release Conditions

COMES NOW, Anthony M. Solis, counsel for defendant, Daekun Cho, who applies to this Court, *ex parte* for an order setting a status conference regarding the pending application to review conditions of release (Dkt. #30). This application is based upon the attached declaration of Anthony M. Solis.

This application is unopposed by the government.

Dated: August 31, 2023

Anthony M. Solis,
A Professional Law Corporation

Anthony M. Solis /s/
By: Anthony M. Solis
Attorney for Defendant
Daekun Cho

Declaration of Anthony M. Solis

Anthony M. Solis declares as follows:

1. I am the attorney for defendant Daekun Cho. I make this declaration in support of an application for an order to set a status conference in this matter regarding the pending motion for bail review, reviewing the detention order of Mag. Judge Wilner, May 8, 2023.

2. A bail review was heard before Magistrate Judge Michael R. Wilner on May 8, 2023. At that time Mag. Judge Wilner ordered Mr. Cho detained. On May 17, 2023, an application to review Mag. Judge Wilner's order of detention was filed. (Dkt. #30) A hearing was held on that application on August 3, 2023, nearly three months later. However, nearly four weeks following the hearing and after an order that the matter was taken under submission and an order after hearing would follow, no order has issued. Trial is set in this matter for October 17, 2023.

3. Request is made that the Court set a status conference on this issue to determine whether additional information is required by the Court to determine the issue. As the Court may recall, either party intends to appeal an adverse ruling by this Court to the Court of Appeals. This litigation will invariably delay the preparations for trial in this matter. In order to properly prepare for trial, the resolution of this bail issue is important to both parties.

4. On August 29, 2023 I communicated with the government regarding this matter. AUSA Jena MacCabe informed me that the government has no objection to the defendant's request for a status conference as set forth above.

5. For the foregoing reasons, it is respectfully requested that the Court set a status conference regarding the pending bail motion, unless of course, a ruling issues in advance of any determination of this application.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 31st day of August 2023 at Calabasas, California.

Anthony M. Solis /s/
Anthony M. Solis